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February 9, 2024

## VIA Email

Honorable Freda L. Wolfson, U.S.D.J. (ret.)  
Lowenstein Sandler LLP  
One Lowenstein Drive  
Roseland, NJ 07068

**Re:    *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,*  
Civil Action No. 22-2632 (JKS) (CLW)**

Dear Special Master Wolfson:

On behalf of Plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”), we write to provide an update regarding JJHCS’s pending request (ECF No. 191) that Exhibit 81 to ECF No. 165 (the “Joint Letter”) be withdrawn from the Court’s docket.

As we have explained, Exhibit 81, a redacted document that Save On SP, LLC (“SaveOnSP”) submitted as an exhibit to the Joint Letter, has remained under seal since its filing in October 2023. In an order docketed this morning, Judge Waldor granted JJHCS’s motion to permanently seal Exhibit 81 on the Court’s docket. *See* ECF No. 200. This ruling bolsters JJHCS’s position that withdrawing Exhibit 81 from the docket will not jeopardize the public right of access to court proceedings as the document will retain its seal under all circumstances. *See* ECF No. 191 at 2. Further, SaveOnSP—which certified its destruction of all copies of Exhibit 81 in its possession—has no access to the

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document through the docket either, thus refuting its contention that the Exhibit is not sealed as to it.

See Feb. 6, 2024 SaveOnSP Opposition at 4.

We appreciate your time and consideration.

Respectfully submitted,

s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: All counsel of record